

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

In re EFFEXOR XR ANTITRUST  
LITIGATION

This Document Relates To:  
All Actions

Civil Action No. 3:11-5479 (PGS/LHG)

**STIPULATION AND  
ORDER MODIFYING DISCOVERY  
CONFIDENTIALITY ORDER**

*Electronically Filed*

**THE PARTIES** having agreed to and having signed a Stipulated Discovery Confidentiality Order (“DCO”), and the DCO having been executed by the Honorable Lois H. Goodman, U.S.M.J., on August 23, 2013 (DE No. 244 in Civil Action No. 11-5479);

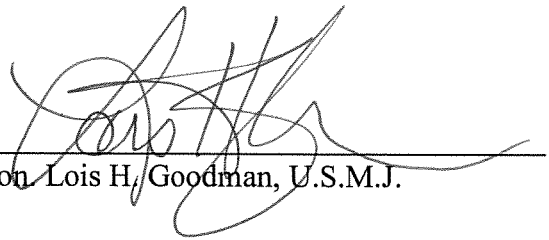
**IT APPEARING** that paragraph 5(b)(iii) of the DCO allows each party to identify “up to four (4) in-house counsel for each Party” to whom certain Confidential Information may be disclosed, and the parties having agreed and consented to the addition, under paragraph 5(b)(iii) of the DCO, of Connie Matteo and Carlton Wessel as in-house counsel for Defendants Wyeth LLC, Wyeth Pharmaceuticals, Inc., Wyeth-Whitehall Pharmaceuticals LLC, and Wyeth Pharmaceuticals Company (collectively, the “Wyeth”), and the removal of Malini Moorthy as in-house counsel for Wyeth;

**IT IS THEREFORE** stipulated and agreed that Connie Mateo and Carlton Wessel shall be added to paragraph 5(b)(iii) of the DCO, and that Malini Moorthy shall be removed from paragraph 5(b)(iii) of the DCO; and

**IT IS FURTHER** stipulated and agreed that the in-house counsel for Wyeth being added to the DCO by this Stipulation shall abide by all the terms and conditions of the DCO and shall be granted access to all “Confidential” information protected under the DCO after execution of the Endorsement attached to the DCO as Exhibit A, acknowledging the he or she has read the DCO

and shall abide by its terms.

SO ORDERED this 23<sup>RD</sup> day of JANUARY, 2019

  
Hon. Lois H. Goodman, U.S.M.J.

**STIPULATED AND AGREED TO BY:**

**CARELLA, BYRNE, CECCHI,  
OLSTEIN, BRODY & AGNELLO, P.C.**

*Chair, Indirect Purchaser Plaintiffs'  
Executive Committee*

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BY: s/ Liza M. Walsh  
Liza M. Walsh

DATE: January 22, 2019

DATE: January 22, 2019

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